



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**URGENT MATTER -- PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

March 8, 2016

Mr. Paul Donndelinger, Manager, Environmental & Engineering Services  
Cooley Group  
50 Esten Avenue  
Pawtucket, RI 02860

RE: **NOTICE OF VIOLATION** of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA) and State of Rhode Island and Providence Plantations Rules and Regulations for Hazardous Waste Management (Rhode Island Rules).

Dear Mr. Donndelinger:

On October 30, 2014, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of Cooley Group, (Cooley) in Pawtucket, Rhode Island, EPA ID No. RID001199728, with RI Rules 1.00-17.00 and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Rhode Island has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of RI Rules 1.00-17.00 and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The violations are set forth below:

1. Failure to provide secondary containment where containers of hazardous waste are stored;
2. Failure to include the name of the inspector in the inspection logs of the hazardous waste storage area;
3. Failure to provide training records on current personnel with duties relating to emergency procedures;
4. Failure to include on each container in satellite accumulation, words that identify the contents of the container; and,

5. Failure to manage universal waste lamps in containers.

**Cooley Group must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.**

**Within (30) thirty calendar days of receipt of this NOTICE**, submit a written description, with supporting documentation, of the actions taken to address requirements one through five above. Submit the information to:

Donald MacLeod, Environmental Engineer  
U.S. Environmental Protection Agency  
Office of Environmental Stewardship (OES05-4)  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912

Failure to correct the violations as required by this NOTICE may subject the facility to further Federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. If you have any questions regarding this NOTICE, please contact Donald MacLeod, of my staff, at 617-918-1405.

Sincerely,

Mary Jane O'Donnell, Manager  
RCRA, EPCRA and Federal Facilities

cc: Sean Carney, RIDEM  
File